

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
and JANE DOES 1 through 5,
Defendants.

Civil Action No. 04-10535 PBS

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to this Court's Notice of Scheduling Conference, dated May 25, 2004, and Local Rule 16.1(D), the parties submit this Joint Statement in anticipation of the scheduling conference set for June 17, 2004.

A. CONFERENCE OF COUNSEL

Counsel for plaintiff Direct Report Corporation, d/b/a Shareholder.com, Inc., and counsel for defendants CCBN.com, Inc. and The Thomson Corporation conferred as provided in Local Rule 16.1(B) on June 7, 2004. The parties agreed that a discussion of the proposed discovery and motion schedules should be on the agenda for the scheduling conference. Additionally, the parties agreed that the issuance of a protective order to govern discovery of confidential information should be on the agenda.

B. PROPOSED PRETRIAL SCHEDULE

As discussed in their Motion to Stay Discovery, Defendants believe discovery should be stayed pending the Court's ruling on their Motion to Dismiss the Amended Complaint. Plaintiff

opposes any stay of discovery. Accordingly, the parties propose the following discovery and motion schedules:

PRE-TRIAL EVENT	PLAINTIFF'S PROPOSED SCHEDULE	DEFENDANTS' PROPOSED SCHEDULE
Exchange of Initial Disclosures	June 21, 2004	Same
Commencement of Fact Discovery	June 21, 2004	Upon the Court's ruling on the Motion to Dismiss
All Motions To Amend The Pleadings, Including Motions Concerning The Joinder Of Parties	August 1, 2004	Same
Close of All Fact Discovery	February 1, 2005	Seven months after the ruling on the Motion to Dismiss
Rule 26(a)(2)(B) Expert Disclosures Due	March 1, 2005	One month after the close of all fact discovery
Rule 26(a)(2)(C) Expert Disclosures Due	April 1, 2005	One month after the Rule 26(a)(2)(B) Disclosures are due
Close of Expert Discovery, Including Expert Depositions	May 1, 2005	One month after the Rule 26(a)(2)(C) Disclosures are due
Dispositive Motions Filed	June 15, 2005	Six weeks after the close of expert discovery
Final Pretrial Conference	August 15, 2005	Two months after Dispositive Motions are filed
Trial Date	At the Court's earliest convenience after August 15, 2005	At the Court's earliest convenience after the final pretrial conference

C. AMOUNTS AND TYPES OF DISCOVERY

At this stage, the parties are not proposing any changes to the number and type of discovery events set forth in Local Rule 26.1(C).

D. TRIAL BY MAGISTRATE JUDGE

Neither party consents to having the case tried by a magistrate judge.

E. LOCAL RULE 16.1(D)(3) CERTIFICATIONS

The parties will be separately filing their certifications.

F. SETTLEMENT

Pursuant to Local Rule 16.1(C), plaintiff submitted a written settlement offer to defendants on June 7, 2004.

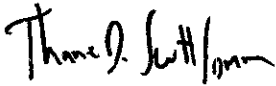
G. PROTECTIVE ORDER

The parties agree that good cause warrants entry of a Protective Order by the Court to facilitate discovery and allow for the protection of confidential and proprietary business information during the course of this action. The parties intend to submit a proposed protective order to the Court.

Respectfully submitted,

SHAREHOLDER.COM, INC.

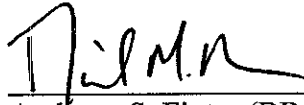
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June 9, 2004